



COUNCILMEMBER SHERRI S. LIGHTNER

FIRST DISTRICT
CITY OF SAN DIEGO

April 3, 2009

Naval Facilities Engineering Command Southwest
1220 Pacific Highway
San Diego, California 92132-5190
Attn: MV-22 Homebasing EIS Project Manager

Dear Project Manager:

This letter is to comment on the United States Marine Corps Draft Environmental Impact Statement for the West Coast Basing of the MV-22. Due to the proximity of MCAS Miramar and the communities of San Diego that I represent (University City, La Jolla, Torrey Pines, Torrey Hills, Carmel Valley, Del Mar Mesa, and Rancho Peñasquitos), the Full Basing alternative or the Maximum Partial Basing alternative of the MV-22 will likely have an impact on the quality of life in these neighborhoods. These impacts can be both positive, such as the economic impacts, and negative, such as the noise impacts. I urge those who will make this decision to prioritize the protection of the quality of life and the safety of the surrounding communities.

The major potential negative impacts to the surrounding communities that concern me most relate to noise, ground traffic & transportation, biological resources, air quality, and safety.

Noise:

The EIS finds that the 65 dB CNEL noise contour would extend further into the surrounding communities under both the Full Basing alternative and to a slightly lesser extent under the Maximum Partial Basing alternative. While there will be no change in the type of land currently affected by the 65 dB CNEL, the expansion of this contour is a major concern. My concern is magnified by the additional, cumulative impacts of both the increase in operational tempo due to the Grow the Force initiative, and the potential basing of the F-35B Joint Strike Fighter (JSF) at MCAS Miramar. While the EIS for the basing of the JSF has not been completed, it is generally understood that the JSF generates more noise than the current F/A-18. With both the MV-22 and the JSF stationed at Miramar, it is likely that noise may negatively impact livability in certain neighborhoods in University City and Carmel Valley. This could affect not only the everyday life that these residents currently enjoy, but also the value of their homes. If you go forward with one of these two alternatives, I urge you to seek new ways of mitigating this noise to the greatest extent possible, including modifying flight paths to minimize the expansion of noise contours. I also urge vigilance on the part of squadron commanders in ensuring that the pilots under their command limit their flight strictly to the established corridors.



Ground Traffic and Transportation:

The EIS finds that the Full Basing alternative would add an estimated 2,444 trips onto existing roadways, and the Maximum Partial Basing alternative would add an estimated 1,596 trips onto existing roadways. As stated in the EIS, this is a significant portion of total traffic volumes for the segment of Miramar Way between Kearney Villa Road and I-15. These impacts could be exacerbated by the cumulative impacts of several other projects that are ongoing or about to begin at MCAS Miramar: the basing of the JSF and the Grow the Force initiative. While these roads are not in District 1, which I represent, I am concerned because they are routes that my constituents travel on a daily basis. The predicted increase in traffic will affect their daily lives. If you proceed with one of these two alternatives, I urge you to look for alternative transportation methods to mitigate the traffic concerns to the greatest extent possible.

Biological Resources:

The EIS finds that the Full Basing alternative would result in significant and unavoidable impacts to vernal pool habitat, and direct loss of San Diego fairy shrimp, San Diego button-celery, San Diego mesa mint populations, as well as significant and mitigable impacts to Diegan coastal sage scrub, coast live oak riparian forest, Waters of the U.S., chaparral, and the California gnatcatcher. This option also has direct impacts on species that are federally listed as threatened or endangered that could be reduced through mitigation, but not entirely. I applaud the fact that the preferred alternative, the Maximum Partial Basing alternative, reduces many of these biological impacts—though not entirely. I urge you to look for ways to further reduce these impacts, because even though the impacts may be relatively small, the community is concerned about any impacts to these plants and animals.

Air Quality:

The EIS finds that both the Full Basing and Maximum Partial Basing alternatives would not significantly impact overall air quality within the San Diego Air Basin. However, this is only because increases in certain types of pollution are balanced by decreases in other types of pollution. I am concerned that both the Full Basing and Maximum Partial Basing alternatives would result in emissions that would exceed NOx significance thresholds in the San Diego Air Basin. I urge you to look for ways to reduce your NOx emissions so that the chosen alternative does not increase the presence of this air pollutant in our communities, and if possible reduces them to assist in meeting the goals of California Assembly Bill 32.

Safety:

The EIS finds that the proposed action would not result in significant impacts to environmental health and safety of public or military personnel. However, it finds that in the future, the level of use of restricted airspace is likely to increase due to the basing of the JSF, the Grow the Force initiative, and other actions. The EIS states that this may require more coordination between regional FAA and military airspace managers, and for airfield APZs to be updated. The growth in air traffic above the communities surrounding MCAS Miramar is a major concern. I urge you to adequately prepare for coordination with the FAA, as well as update the APZs as necessary, so that the San Diego communities surrounding MCAS Miramar remain safe.

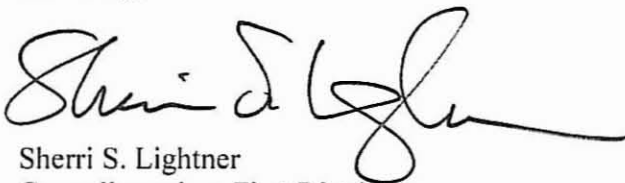
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I would be remiss to only highlight the negative impacts of the Full Basing or Maximum Partial Basing alternatives. According to the EIS, both alternatives are projected to result in positive economic impacts for the surrounding communities. The Full Basing alternative would result in a projected one-time impact (due to construction) of \$1 billion in spending, 10,048 annual jobs, and \$460 million in personal income. The subsequent annual impact of base operations under this alternative is projected to be 1,659 jobs, \$104 million in spending, and \$76 million in income. The Maximum Partial Basing alternative would result in a projected one-time impact (due to construction) of over \$515 million in spending, 5,055 annual jobs, and over \$231 million in personal income. The subsequent annual impact of base operations under this alternative is projected to be 1,083 jobs, \$68 million in spending, and nearly \$50 million in income. With either alternative, these numbers are significant and will positively affect our local economy. The basing of the MV-22 at MCAS Miramar would be welcome economic stimulus to San Diego's communities.

I appreciate your efforts to date to publicize the EIS process and include community input, such as the latest scoping meeting held on March 24, 2009. I request that you continue to include public input and use every available opportunity to publicize the EIS process and the potential change in the type and number of aircraft based at MCAS Miramar. I encourage you to find future opportunities for community involvement and comment above and beyond what is legally required.

Finally, I respectfully request that the final decision-making be a transparent process so that all citizens can feel confident that their concerns were taken into consideration and that the Marine Corps is mindful of their quality of life and safety. If I can assist in any way, please contact my office at (619) 236-6611.

Sincerely,

A handwritten signature in black ink, appearing to read "Sherri S. Lightner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Sherri S. Lightner
Councilmember, First District
The City of San Diego

cc: General Michael R. Lehnert
Colonel David C. Myers
C. Laura Thornton